

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	Crim. No. 17-201-01 (ABJ)
PAUL J. MANAFORT, JR.,	)	
	)	
Defendant.	)	

DEFENDANT PAUL J. MANAFORT, JR.'S MOTION FOR  
LEAVE TO FILE UNDER SEAL RENEWED MOTION  
FOR RECONSIDERATION OF CONDITIONS OF RELEASE

Defendant Paul J. Manafort, Jr., by and through counsel, moves for leave to file under seal this renewed motion for reconsideration of conditions of release per the Court's recent Minute Order. *See* Minute Order dated February 22, 2018. The basis for sealing this motion remains the same as for the original motion for reconsideration, and the supplemental filings, which the Court previously granted.

The general policy is that public access to judicial proceedings and judicial records is important to the proper functioning of our justice system; however, there is good cause and compelling reasons in this instance to seal the renewed motion for reconsideration of conditions of release. More particularly, the defendant is seeking reconsideration of the conditions of release identified in the December 15, 2017 Order. On February 22, 2018, the Court advised that Mr. Manafort could propose a different bond package if he chose. *See* Minute Order dated February 22, 2018. The submission of additional materials containing sensitive financial information, personal addresses, etc., is required for the Court to evaluate the conditions of release under 18 U.S.C Section 3142 and determine the least restrictive conditions that will reasonably assure the

defendant's appearance as required. *See United States v. Xulum*, 84 F.3d 441, 443 (D.C. Cir. 1996) (per curiam).

Further, the defendant requests permission to submit a redacted version of the renewed motion for docketing on the public record, in accordance with the Court's previous guidance.

WHEREFORE, the defendant moves for leave to file under seal this renewed motion for reconsideration of conditions of release, including its attachments, and for permission to file a redacted version of the motion on the public docket.

Dated: March 12, 2018

Respectfully submitted,

/s/

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/s/

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